

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Sarah Zehr, et al. v. Zhejiang Huahai
Pharmaceutical Co., Ltd., et al.*

Case No. 1:19-cv-12935

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF SARAH ZEHR**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Hetero Drugs Ltd. And Hetero Labs Ltd. will take the deposition upon oral examination of Sarah Zehr on May 20, 2021 at 9:00 a.m. EST at Hill Wallack LLP, 21 Roszel Road, Princeton, NJ 08540. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Eric Abraham, Esq.
Hill Wallack LLP

21 Roszel Road
Princeton, NJ 08540
(609) 924-0808
eabraham@hillwallack.com

To the extent not previously produced, the deponent shall produce prior to or at the deposition the documents and tangible things listed on Exhibit A, attached hereto, that are in the deponent's possession, custody and control, including in the possession, custody or control of the deponent's attorney and/or other agents.

Date: May 11, 2021

Respectfully submitted,

/s/ Eric Abraham
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*Attorney for Defendant Hetero Labs Ltd. And
Hetero Drugs Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Sarah Zehr was served upon the following via ECF, with copies to Counsel for Plaintiffs and all counsel of record by e-mail:

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